

September 18, 2006

California Environmental Protection Agency  
Unified Program Section  
1001 "I" Street, 2<sup>nd</sup> Floor  
Sacramento, CA 95812  
Attention: Kareem Taylor

**SUBJECT: Quarterly Update / Response to Evaluation Summary of Findings –  
City of Glendale, Fire Department / Environmental Management Center**

### **Background Information**

**CUPA:** Glendale City Fire Department

**Date of Evaluation:** March 15, 2006

### **State Evaluation Team**

**Cal/EPA Team Leader:** Kareem Taylor

**DTSC Evaluator:** Tom Asoo

### **Deficiencies and Corrective Actions Status Report**

1. **Deficiency:** The Self-Audit did not include all the elements in a more descriptive and narrative fashion.

**July 24, 2006 Update:** Our annual summary report did include a list of deficiencies with a plan of correction and/or a status update. The copies of annual reports (Report 1-6) have been reported to the State on a timely fashion. However, the remaining items such as activities related to single fee system, making the Unified Program consistent, fee accountability and new ordinances were left out since there were no changes. For the 2005-06 Self-Audit report, the Glendale CUPA will make sure that all required elements are discussed in a narrative format regardless the lack of any new changes in any activity during that period.

**September 18, 2006 Update:** We are in process of completing the 2005-06 self-audit report in accordance with state guidelines. The final report will be available for evaluation by September 30, 2006.

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2. **Deficiency:** The CUPA is not inspecting HMRRP facilities once every three years.

**July 24, 2006 Update:** Presently the Glendale CUPA is in full force with respect the number of Inspectors. The 2005-06 inspection number is looking very promising and will surpass all our expectations.

**September 18, 2006 Update:** We are in process of completing the 2005-06 self-audit reports in accordance with state guidelines. The final report will be available for evaluation by September 30, 2006 and will include Forms 1-6. The 2005-06 inspection numbers are looking very promising and will surpass all our expectations.

3. **Deficiency:** The CUPA is not inspecting Hazardous Waste Generators once every three years.

**July 24, 2006 Update:** Same response as number 2 above.

**September 18, 2006 Update:** We are in process of completing the 2005-06 self-audit report in accordance with state guidelines. The final report will be available for evaluation by September 30, 2006 and will include Forms 1-6. The 2005-06 inspection numbers are looking very promising and will surpass all our expectations.

4. **Deficiency:** The CUPA documents return to compliance upon re-inspection facilities, however, certification of return to compliance from the facilities found to have minor violations is not obtained.

**July 24, 2006 Update:** Presently, the Glendale Fire CUPA is in process of updating and upgrading our database and various report formats available for Inspectors. The new format will include a separate area for businesses to certify their return to compliance and be able to mail the form back to CUPA.

**September 18, 2006 Update:** Final draft was approved and sent to graphics for printing.

5. **Deficiency:** The CUPA is not always detailing observations made at the facility and the factual basis for alleging those violations in the inspection reports. During the file, I observed inspection reports that only listed the general corrective measure.

**July 24, 2006 Update:** Presently, the Glendale Fire CUPA is in process of updating and upgrading our database and various report formats available for Inspectors. The new inspection form will have a "Comment" field immediately next to the violation description field where the Inspector will

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have ample space to describe the violation in detail and even suggest certain remedies to resolve the situation properly and diligently.

**September 18, 2006 Update:** The new inspection form has been delayed due to contract / P.O. delays. However, Inspectors are using existing format to detail their observations made at the facility in the inspection report.

6. **Deficiency:** The CUPA is not taking formal enforcement actions on cases where Class I hazardous waste violations are identified. Annual Summary Reports identified Class I violations that were not followed up with a formal enforcement action.

**July 24, 2006 Update:** Conducted in-house training for Inspectors to reinforce their knowledge regarding “Formal Enforcement Action” and Class I violations. At the same time, each Inspector received a copy of our Enforcement Policy and associated paperwork required for pursuing a formal enforcement action.

**September 18, 2006 Update:** Deficiency corrected

7. **Deficiency:** The CUPA is ensuring that PBR facilities are submitting their annual notification form to the CUPA; however, acknowledgement/reauthorization letter issued to the PBR facility for their onsite treatment activity was not found.

**July 24, 2006 Update:** This specific violation was negligence on the Inspector part since the Glendale CUPA has all required generic letter and forms that could be used by the staff to notify the business owner. The Inspector received in-house training and review of policy and procedures dealing with Tiered Permitting facilities.

**September 18, 2006 Update:** Deficiency corrected

8. **Deficiency:** The CUPA is not always providing an inspection report to the business within 65 days of completing a hazardous waste generator inspection. During the file review, when facility inspection occurred and there were no violations observed, inspection reports were not developed. Facilities did not receive an inspection report.

**July 24, 2006 Update:** Inspectors were contacted and informed about this deficiency. At this point, when a facility inspection takes place, an inspection report is generated whether or not a violation was observed or not.

**September 18, 2006 Update:** Deficiency considered corrected.

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Should you have any questions regarding this report, please feel free to call me at (818)548-3898 or e-mail me at [vdemirjian@ci.glendale.ca.us](mailto:vdemirjian@ci.glendale.ca.us)

*Vasken Demirjian*

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